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Exhibit 15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAN HARKABI,
GIDON ELAZAR,
 	
              Plaintiff,
 	
vs.
 	
SANDISK CORPORATION,
 	
              Defendant.
	08 Civ. 8203 (WHP) (THK)
	
	ECF Case
	
	DECLARATION OF GURPREET SAHNI

I, Gurpreet Sahni, hereby declare as follows:

1.   I submit this declaration in response to plaintiffs' request for an exact digital copy of the hard drives of Dan Harkabi's and Gidon Elazar's SanDisk-issued laptops. All of the facts in this declaration are known to me personally, and if called as a witness, I could and would testify competently to them.

2.   My business address is 601 McCarthy Boulevard, Milpitas, California, 95035, SanDisk's corporate offices.

Job Responsibilities

3.   I joined SanDisk on or about September 5, 2006 as IT Help Desk, Desktop Support. I held this position until in or about July 2008, when I became IT Supervisor, Back End, Help Desk, a position I still hold today.

4.   In my capacity as IT Help Desk, Desktop Support, I was responsible for imaging computers of individuals whose employment with SanDisk had been terminated. I was also responsible for reimaging users' computers and for offering technical support over the phone. As IT Supervisor, Back End, Help Desk, I am still involved in these activities but my role is more supervisory in nature.

SanDisk's General Computer Data Retention Practices

5.   When a SanDisk employee is terminated, SanDisk's standard practice is to send the terminated employee's computer to the Help Desk. The computer is held at the Help Desk for approximately thirty days. Generally, after the thirty-day period, the computer is imaged, cleaned, and reissued. Computer images are preserved on file servers at SanDisk headquarters, located at 601 McCarthy Boulevard, Milpitas, California, 95035. During the thirty-day period, however, the Help Desk may receive a request to preserve the computer in its current state. When the Help Desk receives such a request, the computer is stored in a locked cage at SanDisk headquarters until permission is granted to take further action.

Computer Data Retention in this Litigation

6.   Plaintiffs in this case, Daniel Harkabi and Gidon Elazar, terminated their employment with SanDisk on or about March 1, 2007.

7.   On or before March 8, 2007, the Help Desk received Harkabi's and Elazar's laptops.

8.   On March 9, 2007, I received an e-mail from Scott Dillon, my supervisor and then-SanDisk Director of Global Operations, requesting that I ensure that Harkabi's and Elazar's computers were set aside and not touched. Following Dillon's request, I had Harkabi's and Elazar's laptops placed in a secured storage area at SanDisk headquarters, where they remained untouched until in or about April 2008.

9.   On April 14, 2007, I received an e-mail from Scott Dillon asking whether Harkabi's and Elazar's laptops were still secured. I replied on April 16, 2007, confirming that Harkabi's and Elazar's laptops were still secured.

10.   In or about April 2008, I contacted Michael Podobnik, who was then SanDisk's

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Director of Information Security, requesting to image, clean, and reissue Harkabi's and Elazar's

laptops. It is my understanding that Podobnik forwarded my request to SanDisk's legal

department and received their approval. Podobnik then granted my request to image, clean, and

reissue Harkabi's and Elazar's laptops.

11.   Within approximately one week of receiving permission to image and reissue

Harkabi's and Elazar's laptops, I and two technicians that I supervise, Arwyn Gonzales and

Donald Riffel, imaged Harkabi's and Elazar's laptops. The images were saved on a SanDisk file

server located at SanDisk headquarters. Harkabi's and Elazar's laptops were then cleaned and

reissued.

12.   I declare under penalty of perjury under the laws of the United States of America

that the foregoing is true and correct.

EXECUTED this 22 day of September, 2009, at Milpitas, California.

_____
Gurpreet Sahni